

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§
	§ 1:17CR154(8)
v.	§ Judge Marcia Crone
	§
JASON WRIGHT (8)	§
	§

**FACTUAL BASIS AND STIPULATION**

The United States of America, presents to the Court, by and through the undersigned Assistant United States Attorney in and for the Eastern District of Texas, joined by the defendant, **Jason Wright** and the defendant's attorney **Dustin Galmor**, and presents this factual basis and stipulation in support of the defendant's plea of guilty to Counts One of the third superseding indictment, and in support thereof, would show the following:

1. That the defendant hereby stipulates and agrees to the truth of all matters set forth in this factual basis and stipulation, and agrees that such admission may be used by the Court in support of his plea of guilty to:
  - Count One of the third superseding indictment, which charges a violation of 21 U.S.C. § 846, conspiracy to possess with the intent to distribute a controlled substance, namely 280 grams or more of cocaine base a.k.a. “crack” cocaine;
2. That the defendant, who is pleading guilty to such indictment, is one and the same person charged in the indictment.
3. That the events described in the third superseding indictment occurred in the

Eastern District of Texas and elsewhere.

4. That had this matter proceeded to trial, the government, through the testimony of witnesses, including expert witnesses, and through admissible exhibits, would have proven, beyond a reasonable doubt, each and every essential element of the offense alleged in the third superseding indictment; specifically, the government would have proven the following stipulated facts:
  - a. Since at least December 2012, **Eric Paul Coleman** had supervised, managed and controlled a drug trafficking organization that distributed and manufactured cocaine base a.k.a. crack cocaine in the Beaumont, Texas, area. The **Coleman DTO** also distributed cocaine HCL that it received from a supplier in Houston, Texas.
  - b. As part of an agreement to distribute cocaine base in the Beaumont area, **Eric Paul Coleman** organized and was the leader of the Coleman DTO. As the leader of the Coleman DTO, **Eric Paul Coleman** supervised and organized the following individuals: **Minnie Coleman, Christopher Dudley, Clayton Howard, Jordan Marshall, Arthur Jenkins, Patrice Stoker, Jason Wright, Lee Roy Hills, and Ivy Chatman**. The agreement to distribute cocaine base and cocaine HCL was a jointly undertaken criminal enterprise with all participants fully aware of the nature and the scope of the **Coleman DTO's** cocaine base and cocaine HCL trafficking activities. Each sale and agreement to sell any amount of cocaine base and/or cocaine HCL was in furtherance of the **Coleman DTO's** drug trafficking activities and was reasonably foreseeable to all members of the **Coleman DTO**, including **Jason Wright**.
  - c. **Jason Wright** was personally aware of, reasonably foresaw, and aided and abetted the Coleman DTO's conspiracies to possess with the intent to distribute 597 grams of cocaine base and 6 kilograms of cocaine HCL.
  - d. **Jason Wright** routinely delivered cocaine base and cocaine HCL to **Coleman DTO** customers on behalf of **Eric Paul Coleman**. When **Eric Paul Coleman** was unavailable to delivery cocaine base and cocaine HCL to customers, **Jason Wright** handled the transactions for **Eric Paul Coleman**.

- e. Some of the cocaine HCL was sold in its powder form. **Eric Paul Coleman, Minnie Coleman, Jordan Marshall,** and **Lee Roy Hills** assisted in converting the cocaine HCL received from **Christopher Dudley** and **Clayton Howard** into cocaine base that the **Coleman DTO** distributed in Beaumont, Texas. This was done at a home belonging to Minnie Coleman at 3375 Paris Street in Beaumont. **Eric Paul Coleman** with assistance from **Jordan Marshall, Patrice Stoker,** and **Lee Roy Hills** caused cocaine HCL to be converted into cocaine base at homes **Eric Paul Coleman** owned at 8520 Lawrence Drive, Beaumont, Texas, a.k.a. "The Field" as well as 5795 Stanford Drive, where **Eric Paul Coleman** and **Patrice Stoker** resided as of December 2017. **Eric Paul Coleman** owned 8520 Lawrence Drive for the purpose of manufacturing and distributing cocaine base and cocaine HCL.

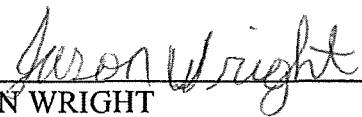
#### DISTRIBUTION WITHIN 1000 FEET OF HOMER DRIVE ELEMENTARY

- f. On November 10, 2017, at **Eric Paul Coleman's** direction, **Jason Wright** went into Coleman's residence at 5795 Stanford Drive. At **Eric Paul Coleman's** direction, **Jason Wright** took 127 grams of cocaine HCL and then left the property to distribute the cocaine HCL to a customer of the Coleman DTO. This residence is within 1000 feet of Homer Drive Elementary.

#### DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

5. I have read this factual basis and stipulation and the third superseding indictment or have had them read to me and have discussed them with my attorney. I fully understand the contents of this factual basis and stipulation and agree without reservation that the United States can prove each of these acts and that it accurately describes the events about my acts and the events as recited as I know them.


Dated: 8-2-18

  
\_\_\_\_\_  
JASON WRIGHT  
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT


6. I have read this factual basis and stipulation and the second superseding indictment and have reviewed them with my client, **Jason Wright**. Based upon my discussions with the defendant, I am satisfied that the defendant understands the factual basis and stipulation as well as the indictment, and is knowingly and voluntarily agreeing to these stipulated facts.

Dated: 8-2-18

  
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DUSTIN GALMOR  
Attorney for the Defendant

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

  
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CHRISTOPHER RAPP  
Assistant United States Attorney  
Eastern District of Texas  
350 Magnolia, Suite 150  
Beaumont, Texas 77701  
(409) 839-2538  
(409) 839-2550 Fax  
Arizona Bar No. 025704